

W.K., et al v. Red Roof Inns, Inc., et al

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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

W.K., Et Al,

Plaintiff,

vs.

CIVIL ACTION FILE

**PL Sum. J.**  
**Ex. 005**

RED ROOF INNS, INC.; FMW NO. 1:19-cv-5263-MHC  
RRI NC, LLC; RRI III,  
LLC; RED ROOF  
FRANCHISING, LLC; RRI  
WEST MANAGEMENT, LLC;  
WESTMONT HOSPITALITY  
GROUP, INC.; WHG SU  
ATLANTA, LLC; EXTENDED  
STAY AMERICA, INC.; ESA  
MANAGEMENT, LLC; ESA P  
PORTFOLIO, LLC; ESA P  
PORTFOLIO OPERATING  
LESSEE, LLC; KUZZINS  
BUFORD LLC; CC&S  
DEVELOPMENT, LLC; ESSEX,  
LLC; and HVM, LLC,  
Defendants.

## VIDEO DEPOSITION OF

[REDACTED]  
April 13, 2022

10:44 a.m.

Suite 3900

1201 West Peachtree Street, N.W.  
Atlanta, Georgia

Tracy A. Williams, B-2168, RPR

Lionel Mileman, Videographer

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10 On behalf of the Defendants Red Roof Inns, Inc., FMW

11 RRI, NC, LLC; RRI III, LLC; RRI West Management,

12 LLC; Red Roof Franchising, LLC; Westmont

13 Hospitality Group, Inc.; and WHG SU Atlanta, LLC:

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9  
10 (Pursuant to Article 10(B) of the Rules and  
11 Regulations of the Georgia Board of Court Reporting,  
12 a written disclosure statement was submitted by the  
13 court reporter to all counsel present at the  
14 proceeding.)  
15  
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1 Q. And -- and at the Red Roof Smyrna, you were  
2 allegedly trafficked between 2010 and 2012, correct?

3 A. Yes, sir.

4 Q. Not in 2009?

5 A. Not that I can recall.

6 Q. And the same for the Red Roof Buckhead,  
7 right?

8 A. As far as I can recall.

9 Q. Okay. And I will go in a little more  
10 detail a little on about that. But I just want to  
11 make sure I understand, you know, the knowledge these  
12 people have.

13 So Black would have knowledge about just  
14 generally what occurred. Would she have knowledge  
15 about the two Red Roof hotels?

16 A. Yes.

17 Q. Was she there at the Red Roof hotels?

18 A. She would transport us to and from.

19 Q. And there were two main alleged  
20 traffickers, right? There were two traffickers that  
21 allegedly trafficked you, correct?

22 One is [REDACTED]

23 A. Correct.

24 Q. And he's also known as "Bagz"?

25 A. Correct.

1 you?

2 A. Yeah. She called me up one day, and I was  
3 just going up to my job at RaceTrac. It's a gas  
4 station. She said, "Hey, I've got this great  
5 opportunity for us," and kind of explained it like I  
6 was going to be s personal assistant to somebody and  
7 be able to travel and do things. And so I was  
8 interested, and I wanted to meet him.

9 Q. And you said you -- that's the RaceTrac you  
10 were working at the time?

11 A. Yes, sir.

12 Q. Was that 2009?

13 A. I believe so, yes, sir.

14 Q. Was it about -- that was after you had been  
15 trafficked by Chi?

16 A. Correct.

17 Q. And did she say anything about sex, money,  
18 anything like that?

19 A. Nothing. No, sir.

20 Q. You weren't suspicious at all after  
21 everything that happened with Chi?

22 A. No, sir.

23 Q. She said that you would be Bagz' personal  
24 assistant?

25 A. Something along those lines, yes.

1 Q. And then you said you were interested, you  
2 said?

3 A. Yeah, yeah.

4 Q. And what -- what -- what happened next?

5 A. I met up with her and she took me over to  
6 his house, and she introduced me to him. And we  
7 talked for a few minutes, but nothing was ever  
8 discussed about sex.

9 And from there we went -- we went -- like,  
10 we went out, like, just like a normal night out. And  
11 then it turned from there into trafficking.

12 Q. Okay. And I'll get into more details about  
13 that in a minute, but let me just finish this list  
14 here.

15 [REDACTED] a/k/a "Chi." We talked about  
16 that. How did you meet [REDACTED]?

17 A. I honestly don't recall.

18 Q. And you would have met him 2008, 2009?

19 A. Yeah, around that time.

20 Q. And at that time, you were going to high  
21 school in Alpharetta?

22 A. Correct.

23 Q. Were you living with your parents?

24 A. I don't believe so, no, staying with some  
25 friends.



1 A. Correct.

2 Q. Is that a home, also?

3 A. Correct.

4 Q. Did he also rent that?

5 A. Correct.

6 Q. And then the 2275 Plaster Road Northeast,  
7 Apartment 11, Atlanta, Georgia 30345, is that an  
8 apartment? Is there a name for that apartment  
9 complex?

10 A. It was Sienna Ridge, I believe, at the  
11 time.

12 Q. Whose apartment was this?

13 A. It was in my name.

14 Q. And were you there the entire 2012? Do you  
15 know?

16 A. I don't recall exactly the dates that I was  
17 there from.

18 Q. Was this at the same time you're allegedly  
19 being trafficked?

20 A. It was after. It was when I met baby  
21 daddy.

22 Q. So you've alleged that in 2012, you were  
23 still being trafficked, correct?

24 A. The beginning, yes.

25 Q. So what, about, month do you recall that

1 that trafficking ended?

2 A. I believe it was February or March of 2012.

3 Q. I don't think I asked you this, but have  
4 you stayed at any other Red Roof Inn hotels during  
5 the time you were alleged -- or did you stay at any  
6 other Red Roof hotels during the time you were  
7 allegedly being trafficked?

8 A. As far as I can recall, no.

9 Q. Okay. So the 2275, you rented this  
10 apartment sometime after February, March of 2012,  
11 after you got out of the alleged trafficking, right?

12 A. Correct.

13 Q. And the 2488 Lakewood Avenue, Atlanta,  
14 Georgia, it says 2009?

15 A. Yes.

16 Q. What is -- is that a home?

17 A. It's a group home, I guess, homeless  
18 shelter type thing.

19 Q. And how long were you there?

20 A. I do not recall exactly. I know it was at  
21 least a few months.

22 Q. So between 2009 and 2012, you didn't have  
23 any other addresses or any --

24 A. Just the 490.

25 Q. Your parents?

1 No. 6. If you look at -- we'll just keep looking at  
2 the amended response from last week so that we're the  
3 most current. But it starts on Page 27, I believe.

4 Under Page 28, it says that you were  
5 allegedly trafficked at the RRI, or the Red Roof Inn,  
6 Smyrna by Bagz about two to five times between 2010  
7 and 2012; is that correct?

8 A. Correct.

9 Q. So let me just ask you: In 2010, how many  
10 times do you think you stayed at the Red Roof Inn  
11 Smyrna?

12 A. I don't know exactly.

13 Q. Okay. Would you know how many -- do you  
14 know how many stays -- how many times you stayed at  
15 the Red Roof Smyrna in 2011?

16 A. No, sir.

17 Q. What about 2012?

18 A. No, sir.

19 Q. So in 2012, you were -- you said that you  
20 were only allegedly trafficked up to February?

21 A. I believe so, yes, sir.

22 Q. Do you still believe that you stayed  
23 January or February of 2012 at the Red Roof Inn  
24 Smyrna?

25 A. I believe so, yes, sir.

1 Q. And what about the Red Roof North Druid  
2 Hills or Buckhead? It says here you stayed there one  
3 time. If you look at Page 28, it says -- the last  
4 paragraph on Page 28 says, "Jane Doe 3 was trafficked  
5 at the Red Roof Atlanta once between 2010 and 2012."  
6 Is that correct?

7 A. Correct.

8 Q. Do you recall if that one time you stayed  
9 there was 2010, 2011, or 2012?

10 A. I do not recall.

11 Q. Do you recall if the two to five times you  
12 stayed at the Red Roof Inn Smyrna, the room was under  
13 your name?

14 A. No. I don't believe any of the Red Roof  
15 rooms were under my name.

16 Q. And, therefore, you wouldn't have gone and  
17 checked in, right?

18 A. Correct.

19 Q. And the rooms at the Red Roof Inn Smyrna,  
20 it's an outdoor courtyard hotel, right? You don't  
21 need to go to the front desk to go to your room?

22 A. Correct.

23 Q. And, in fact, did you go straight to your  
24 room, or did you walk through the front desk?

25 A. I did not walk through the front desk.

1           A. Yes, sir -- not really. I mean, it wasn't  
2 even a relationship at that point. I was just -- I  
3 was just meeting him just to see, you know, so I  
4 definitely wouldn't call it a relationship at that  
5 point. But that was -- that was the first time that  
6 we meet, yes.

7           Q. And which hotel was that? Do you know?

8           A. I don't remember. I think it was a Hampton  
9 Inn or something like that.

10          Q. Was he staying there, or was that for the  
11 night?

12          A. I think it was for the night.

13          Q. And what happened after that?

14          A. He told me he was taking me somewhere and  
15 drove me to -- I believe it was like an apartment  
16 complex -- I'm not sure where -- and basically told  
17 me I was going to go upstairs and have sex with this  
18 guy and then come back down when I was done, and the  
19 guy was going to give me money.

20                 And as soon as I did what he said and when  
21 I came back to the car, he made me give him the  
22 money. And from there, it was a wrap.

23          Q. Okay. So you're at the Hampton Inn. You  
24 have sex with him?

25          A. Correct.

1 Q. Did you all sleep overnight?

2 A. I don't think so. I think we just had sex  
3 and then he took me to the outcall.

4 Q. It was that same night?

5 A. I believe so.

6 Q. Okay. So as he was taking you there, did  
7 he tell you what was going on?

8 A. Not until we actually pulled up to the  
9 place.

10 Q. And so you pulled up. What was the place?  
11 An apartment complex, you said?

12 A. That's what I said, yes.

13 Q. And when you pulled up, did he just say,  
14 you're going to go upstairs and have sex with this  
15 guy now?

16 A. That's what I just said, yeah.

17 Q. And did you say no?

18 A. No, I did not because at that point, it  
19 was -- I didn't know what it was. He had already  
20 been talking to me, and I guess after we had sex, he  
21 had -- we had a couple of conversations, but it was  
22 nothing to do with sex or working for sex. It was --  
23 it was like the relationship -- he was trying to  
24 coerce me into a relationship with him.

25 And then once I had kind of agreed, you

1 know, hey, we can do this, I would like to work with  
2 you, and stuff like that -- under the pretense that  
3 it was a personal assistant type of job, not sex  
4 trafficking that I had agreed to -- then I don't  
5 know, it just kind of happened from there.

6 And he took me to this place. And as soon  
7 as he explained it, I was like, I'm already there. I  
8 can't -- I have nowhere to go at this point because I  
9 don't know where I'm at. I'm in an unsafe  
10 environment. I don't -- you know, I don't know how  
11 to explain it better than that.

12 Q. Well, let me just dissect that a little  
13 more. So at the hotel after you all had sex, he  
14 didn't tell you, we're going to now go to another  
15 hotel and you will have sex for money with another  
16 man, right?

17 A. Right.

18 Q. Did you -- and you obviously had come from  
19 a -- an experience with Chi where this had happened,  
20 right?

21 MS. MYKKELTVEDT: Object to the form.

22 Go ahead.

23 THE WITNESS: It was a complete -- no. Chi  
24 was a -- Chi was -- Chi was abusive. He -- he forced  
25 me to have sex by being raped. It wasn't something

1 that I chose to do or something that I wanted to do.  
2 He forcefully raped me and then continued to do so.  
3 So it wasn't even like a pimp/ho situation, honestly.

4 Like, yeah, he made me have sex with  
5 people. And he may have collected money from it, but  
6 I don't know. I don't. I don't know, you know. So  
7 I wasn't thinking, and plus I was homeless at that  
8 time. You know, I had just come back from being  
9 homeless. I was living with my parents, and I had  
10 been in a vulnerable situation. I wasn't in the  
11 right frame of mind to even understand that that's  
12 what was happening to me at that point. You  
13 understand what I'm saying?

14 BY MR. ALLUSHI:

15 Q. With Chi?

16 A. With Bagz.

17 Q. With Bagz.

18 A. Yeah.

19 Q. So when y'all left the hotel and were in  
20 the car going towards the outcall that you said, what  
21 did you think was happening at that time?

22 A. I had no idea. Like said, I didn't know  
23 until we actually pulled up and parked in a spot and  
24 he told me, this is what I'm going to do, and as soon  
25 as you're done, come back downstairs.



1 Q. You didn't say no?

2 A. No, because I didn't feel like I had a  
3 choice at that point.

4 Q. Were you scared of Bagz?

5 A. Yeah.

6 Q. And that was the first night that you had  
7 met him, correct?

8 A. Yeah. I mean, even though it was the first  
9 night that I met him and he seemed nice and kind and  
10 everything like that, I still didn't know this man.  
11 I didn't know anything about him. So I didn't know  
12 what he was capable of at that point.

13 Q. Did he you threaten you in any way?

14 A. I don't remember him threatening me that  
15 night, but I can't recall exactly.

16 Q. And did he brandish any weapons in the car?

17 A. I can't remember.

18 Q. Do you recall if he had a weapon at the  
19 time?

20 A. He had guns the whole time.

21 Q. Did you see them that first night?

22 A. I don't recall.

23 Q. And so your perception was that you had no  
24 choice?

25 A. That's correct.

1 Q. But you don't remember whether or not he  
2 threatened you in any way?

3 A. I don't -- I don't remember the whole -- I  
4 don't remember that first day. I don't remember  
5 every single detail that happened. I remember  
6 meeting him, meeting him with [REDACTED], having sex with  
7 him, going on an outcall. That's all I really  
8 remember.

9 Q. And so you went and had sex for money with  
10 the client, right, the john that night?

11 MS. MYKKELTVEDT: Object to form.

12 THE WITNESS: I was taken to an outcall to  
13 provide sex for money that was then given to my pimp.  
14 BY MR. ALLUSHI:

15 Q. Okay. And I'm trying to understand the  
16 procedure, so to say. So you go upstairs, right?

17 A. I go upstairs, correct?

18 Q. And then did he -- did Bagz stay in the  
19 car?

20 A. Bagz stayed in the car.

21 Q. And did the person know you were coming?  
22 He was expecting you?

23 A. Correct.

24 Q. And how much did he pay?

25 A. I don't remember.

1 Q. Did he give you the money?

2 A. He gave me the money, correct.

3 Q. Was it -- how long was it? An hour call?

4 A. I don't remember.

5 Q. It wasn't an all night, though?

6 A. No.

7 Q. And then you went back down?

8 A. Correct.

9 Q. And was Bagz still in the car?

10 A. Correct.

11 Q. Did he ask for the money?

12 A. He did.

13 Q. Did you give it to him?

14 A. I did.

15 Q. And what happened then?

16 A. I don't remember.

17 Q. Did you stay with Bagz that night, or did  
18 you go home?

19 A. I believe so. I believe I stayed with him.

20 Q. And do you remember where?

21 A. No, sir.

22 Q. And this would have been sometime in 2010?

23 A. 2009 or '10. I can't recall the exact  
24 date. I mean, I was 19, almost 20, when I met him.

25 Q. And how did -- and from that first night,

1 then how did the next day and the next day and the  
2 next day go? Were you staying with Bagz?

3 A. I don't remember.

4 Q. Did you -- did you have a physical address  
5 at the time, or were you living with Bagz hotel to  
6 hotel at the time?

7 A. Hotel to hotel. I mean, he had a physical  
8 address that we would go to when we weren't at the  
9 hotel, but that's it.

10 Q. Is his physical address in the address  
11 lines here in the?

12 A. I don't think so. I don't remember the  
13 address.

14 Q. Did you ever live there?

15 A. I mean, I stayed there when I wasn't at the  
16 hotel, like I just said.

17 Q. Who else lived at Bagz' house?

18 A. All the other girls. I don't know. All  
19 these pimps that are in this thing, they would come  
20 and go. I don't know who exactly was living there  
21 because a lot of people stay there when they wanted  
22 to. It was kind of like an open house.

23 Q. Where was the house?

24 A. Near North River Tavern in Sandy Springs.

25 Q. Was it a how many bedroom house?

1           A. I think it was like a three-bedroom  
2       townhouse or something.

3           Q. When you stayed there, would you stay in  
4       the same room with Bagz?

5           A. It depended. He wasn't always there.

6           Q. Did you have a sexual relationship with  
7       Bagz throughout the entire time?

8           A. Yes.

9           Q. And between 2009 and 2012, were you -- were  
10      you allegedly being trafficked every day?

11          A. Yes, sir.

12          Q. So you -- you worked every day?

13          A. Yes, sir.

14          Q. Seven days a week?

15          A. Yes, sir.

16          Q. And how many people a day do you think that  
17      you would see?

18          A. Minimum of ten.

19          Q. It was a minimum of ten?

20          A. The majority of the time.

21          Q. And was it always men, or was it men and  
22      women?

23          A. What do you mean?

24          Q. The clients, johns, were they all men, or  
25      would you --

1 Q. So Bagz didn't force you to have  
2 necessarily certain fetishes or anal sex?

3 A. He didn't force us to have certain fetishes  
4 that we -- no. No, he did not, no. We had to have  
5 sex, and we had to make money to give to him. How we  
6 made the money, it didn't matter.

7 Q. So it was seven times a day -- I'm sorry --  
8 seven days a week, ten times a day you're saying,  
9 right?

10 A. At least.

11 Q. So that's 70 times 52. So that's 360 --  
12 3,604 -- 3,640 times a year?

13 A. If that's what you're calculating, sure. I  
14 never physically calculated how many johns I saw. So  
15 I'm not sure why that matters.

16 Q. So in the three years, that would be about  
17 10,920 men?

18 A. I'm not sure. There could be in excess  
19 more. There could be less.

20 Q. And out of those 10,920 encounters, there  
21 was -- ten of those would have happened at the Red  
22 Roof North Druid Hills, correct? So you were there  
23 one time, correct?

24 A. I was there a handful of times, between two  
25 to five times at Red Roof. I don't -- I've been to

1 both Red Roofs in Smyrna a handful of times. I don't  
2 recall how many johns I saw at both locations. All I  
3 know is I had a quota of a thousand dollars per day  
4 and to meet that thousand-dollar-a-day quota, I had  
5 to see at least ten patients -- ten people at a  
6 hundred dollars, and that's what I did.

7 Q. I understand that, [REDACTED]. I have to  
8 ask these questions.

9 A. I understand.

10 Q. You have -- specifically you wrote in  
11 here -- and I'll go back to No. 6 -- that you stayed  
12 one time at the Red Roof North Druid Hills --

13 A. Right, right.

14 Q. -- and we went over that; is that correct?

15 A. Yes, that's correct.

16 Q. And one time -- you have had sex with ten  
17 people that day, correct?

18 A. Right.

19 Q. So my question was: Out of the 10,920 men  
20 you were forced to have sex with that you allege --

21 A. Allegedly, yes.

22 Q. -- you only had sex with ten of those  
23 people at the Red Roof North Druid Hills, my client,  
24 correct?

25 A. That sounds about right, yes.

1 Q. And you stayed two to five times at the  
2 Smyrna, and that would make 50 encounters at the  
3 Smyrna out of the 10,920, correct?

4 A. Sounds about right.

5 Q. So after the initial night, [REDACTED],  
6 with Bagz, you learned what his true meaning -- what  
7 his true intention was, correct? After that first  
8 encounter?

9 A. No, sir.

10 Q. When did you learn what his true  
11 intentions -- meaning that you weren't going to be  
12 his personal assistant -- when did you learn that?

13 A. Over the next -- course of the next few  
14 weeks and months. He --

15 Q. So -- go ahead.

16 A. He had me doing stuff for him that was  
17 still personal assistant-ish, but, yeah.

18 Q. But so after the first night that he forced  
19 you to have sex with the -- on the outcall for money,  
20 you still felt you were going to be his personal  
21 assistant?

22 A. Yeah.

23 Q. And you believed that was just a one-time,  
24 or what? How --

25 A. Yeah. I mean, I don't recall exactly. I



1 don't remember what I thought it was going to be. I  
2 just knew -- that's what happened.

3 Q. Did you think you were voluntarily doing  
4 that, or were you aware at the time that you were  
5 being forced to do it?

6 A. I don't know.

7 Q. At what point did you think, I don't want  
8 to -- I don't want to have sex with these guys for  
9 money?

10 MS. MYKKELTVEDT: Object to the form.

11 THE WITNESS: I mean, obviously, pretty  
12 quick into it. I mean, it's not something that  
13 anybody wants to do. I don't know anybody that would  
14 want to have sex for money and give all the money  
15 away to somebody.

16 BY MR. ALLUSHI:

17 Q. Would you want to keep the money for  
18 yourself?

19 A. I wouldn't want to do any of it period if I  
20 had a choice.

21 Q. Throughout the entire time from 2009  
22 through 2012, did you ever keep any of the money from  
23 the commercial sex?

24 A. Not one penny.

25 MS. MYKKELTVEDT: Do you need to take a

1 Q. So you're saying you were more fearful in  
2 2012 than 2011?

3 A. Yes, sir.

4 Q. And so how did that help you just say  
5 you're done if you're more fearful?

6 A. I can't really answer that.

7 Q. So it would have been easier to leave in  
8 2011, '10, because you had less fear, correct?

9 A. No, no. I was still being coerced and  
10 brainwashed daily to think that what I was doing was  
11 okay.

12 Q. And what do you mean, "brainwashed"?

13 A. I was being told that what I was doing was  
14 okay, and that it was -- here's the thing. Bagz --  
15 when I met Bagz and he started talking to me, he  
16 presented himself to me as a savior. He would preach  
17 to us from the Bible and spin everything to make it  
18 seem like we were doing right by God. We were being  
19 virtuous women towards him and towards God. So you  
20 have to understand that what he did to my mind made  
21 me not think like a normal person.

22 Q. So did he make you think you were  
23 voluntarily doing this?

24 A. No, no.

25 Q. You just -- he just made you think that you

1 were doing a virtuous thing by having commercial sex  
2 for money that he kept?

3 A. Can you ask me that question again?

4 Q. Yeah, sure. So he -- you were just  
5 describing that he was reading the Bible and making  
6 you -- or brainwashing you, right?

7 A. Yes.

8 Q. And by brainwashing, does the brainwashing  
9 include you believing you're voluntarily doing the  
10 things for him or no?

11 A. I don't know how to answer that. I  
12 don't -- I can't answer that. I don't -- I don't --  
13 I don't know how to answer that.

14 Q. Well, do you think you -- do you think --  
15 did you --

16 A. I never ever once thought I was doing  
17 anything voluntarily. Let's just get that  
18 understood, okay? I never once did anything by  
19 choice. Even if I thought it was the right thing to  
20 do at that time, it was because it was still being  
21 forced on me that I had to do that.

22 Q. Okay. What's the brainwashing? That's  
23 what I'm trying to understand.

24 A. That is the brainwashing. The telling me  
25 that "I'm your savior. I'm here to save you. I'm

1 here to help you. I'm going to rescue from all these  
2 things that you've had happen to you in your past  
3 life or whatever." It's like, it's not even that.  
4 It's "I'm a savior. I'm here to save you. I'm going  
5 to take care of you. I'm going to support you in  
6 everything that you do because what you're doing is  
7 for me," and that's what it is. I mean, I don't know  
8 how else to explain brainwashing.

9 I mean, I'm still having issues getting  
10 over the brainwashing. Like, I still have -- I  
11 don't -- I don't know. I don't know what else you  
12 want me to tell you.

13 Q. And what saving did you think you needed at  
14 the time? From what?

15 A. I was homeless. I didn't have anywhere to  
16 stay. I didn't have anybody to love me, protect me,  
17 guide me. And he did all of those things.

18 Q. What about your parents?

19 A. They weren't in the picture at that time.

20 Q. Why not?

21 A. I don't know. We hadn't spoken since I  
22 emancipated myself.

23 Q. Could you have called your parents and gone  
24 and stayed with them?

25 A. No, I don't think so.

1 A. No, sir.

2 Q. Did you buy any clothes during the time  
3 that you were being trafficked?

4 A. Yeah, I'm sure we did.

5 Q. And where would that be?

6 A. I'm not sure exactly.

7 Q. And did you sue any of the stores that you  
8 bought the clothes from?

9 A. No, sir. None of these places that you're  
10 talking about would have any knowledge of any of that  
11 going on that I would know of, so.

12 Q. They all profited from your trafficking,  
13 though, right? They made money?

14 A. They did, absolutely.

15 Q. And why would the Red Roof have knowledge,  
16 and they didn't have knowledge?

17 A. Well, because it wasn't discrete over  
18 there. It was out in the open, and everybody could  
19 see it.

20 Q. Where was it out in the open?

21 A. You could see girls hanging off the balcony  
22 in their short clothes, pimps in their cars in the  
23 parking lot on their phones, drug dealers walking  
24 around, johns walking around, girls walking around  
25 beating their feet with no clothes on, talking on

1 cell phones, meeting johns, taking them up to their  
2 rooms. You could see all of that.

3 Q. And how would one know that somebody is a  
4 pimp?

5 A. I mean, I guess you wouldn't know just by  
6 looking at them, but you could tell. I mean, I know  
7 I can spot a pimp from a mile away. Most of them  
8 have on a pinky ring, lots of flashy jewelry, drive  
9 nice cars, and they always are surrounded by women.

10 Q. But there are a lot of other people that do  
11 the same, right, as --

12 A. Not necessarily, no.

13 Q. And how would you identify somebody that's  
14 selling themselves for sex without talking to them?

15 A. Most of the time they would just look like,  
16 you know, very slutty, walking around with, like I  
17 said, no clothes on and talking on phones, talking  
18 with different guys, meeting different guys and  
19 walking them up to their rooms and stuff.

20 Q. And you're saying that that's different  
21 from how, you know, a lot of other girls dress these  
22 days?

23 A. These days, no. But ten years ago, yeah,  
24 yeah.

25 Q. And so it's your testimony here today that

1 because there were girls that were dressed scantily  
2 walking around, the hotel should have known that  
3 there was sex trafficking?

4 MS. MYKKELTVEDT: Objection to form.

5 BY MR. ALLUSHI:

6 Q. You can answer.

7 A. I mean, I don't think that they would --  
8 can you repeat the question for me?

9 Q. Yes. So it's your testimony here today  
10 that the Red Roof should have known -- because the  
11 girls were dressed scantily that they should have  
12 known they were being trafficked?

13 A. That wouldn't be the only reason that they  
14 should know.

15 Q. Okay. What else?

16 A. The multiple requests for towels, the  
17 condoms that are overflowing in the trash cans, like  
18 I said, the pimps outside, the drug dealers outside,  
19 the johns outside, the girls outside.

20 Q. But you -- but you personally never told  
21 anybody you were being trafficked, right?

22 A. You mean --

23 Q. At the hotel. At the Red Roof, did you  
24 tell anybody?

25 A. No. None of the employees, no.

1 for approximate \$33. [REDACTED] said that an -- that  
2 the unauthorized charges for both of her cards took  
3 place on January 30, 2011, at unknown times. [REDACTED]  
4 said that the representative canceled both cards for  
5 her while he was speaking with her on the phone."

6 And so my question is: In 2011, you were  
7 with Bagz, correct?

8 A. Yes, sir.

9 Q. And you were being allegedly trafficked at  
10 the time?

11 A. Uh-huh.

12 Q. And you had no money at that time, right?

13 A. Yes, sir.

14 Q. And do you know where this money that  
15 allegedly is being taken from your bank account was  
16 coming from?

17 A. Bagz.

18 Q. Okay. So was Bagz giving you money to  
19 deposit in your own bank?

20 A. When he would give me money, I would either  
21 use cash or put it in my bank and use it that way.

22 Q. So it's fair to say he didn't keep all the  
23 money. He gave some of the money to you.

24 A. No, no. That's not fair to say. He kept  
25 all of the money. We did not have any access to the



1 money unless it was something that we absolutely  
2 needed, and he would provide it for us.

3 Q. So if it was something that you absolutely  
4 needed, then he gave you money?

5 A. Yes.

6 Q. And that money came from the commercial  
7 sex?

8 A. Correct.

9 (Defendants' Exhibit JD3-8 was marked for  
10 identification.)

11 BY MR. ALLUSHI:

12 Q. [REDACTED], I'm handing you over what I  
13 just marked as Defendants' JD3-8. And this is an  
14 incident police report dated May 1st, 2011.

15 Have you seen this report before?

16 A. No, sir.

17 Q. And it says, "Victim 1, Marriott at  
18 3405 Lenox Road, Atlanta, Georgia."

19 Do you recall staying at that Marriott?

20 A. I do.

21 Q. Were you there with Bagz?

22 A. I was.

23 Q. Were you there being allegedly trafficked?

24 A. Yes, sir.

25 Q. You have not sued the Marriott, correct?

1 walking by?

2 A. Yes, sir.

3 Q. Because it says, "The first female, later  
4 identified as [REDACTED], I observed standing  
5 outside of the Yukon with a black male began to walk  
6 towards me."

7 Is the black male Bagz?

8 A. Correct.

9 Q. And he describes here -- the way that the  
10 transaction was occurring, he's saying that, early on  
11 the phone and then later that he was expecting two  
12 girls, right? That -- that was what he had  
13 requested?

14 A. Apparently, yes.

15 Q. Were you supposed to be the second girl?

16 A. No, sir.

17 Q. Who was the second girl? Do you know?

18 A. I believe it was [REDACTED].

19 Q. And then he describes that [REDACTED] was  
20 looking through the drawers for condoms, right?

21 A. Correct.

22 Q. And he made a comment on the number of  
23 boxes. There was a large number of condoms boxes.

24 A. Correct.

25 Q. And there would have been a large number of

1 condoms in the trash?

2 A. Correct.

3 Q. And the Marriott knew or should have known  
4 based on that that you all were being trafficked?

5 A. I mean, we don't -- typically, when we stay  
6 at the place, we don't let the maids in the rooms.  
7 We leave the privacy notice on the door, so we'll --  
8 the trash will stay there until we're gone.

9 Q. Okay. And did you do the same at the Red  
10 Roof?

11 A. As far as I can recall, yeah.

12 Q. It was your practice. You would have done  
13 it everywhere?

14 A. Correct.

15 Q. And -- but -- so you were saying that after  
16 you were gone, they knew or should have known based  
17 on the condoms they found in the trash?

18 A. Correct.

19 Q. And so should have the Marriott?

20 A. Correct.

21 Q. And what were they supposed to do, call the  
22 police or what? You were gone. How were they going  
23 to save you? How was the Marriott or Red Roof going  
24 to save you?

25 MS. MYKKELTVEDT: Object to the form.

1 THE WITNESS: Yeah. I never asked any of  
2 them to save me, so.

3 BY MR. ALLUSHI:

4 Q. Do you just want money? I mean, what --  
5 I'm confused. What were they supposed to do?

6 A. What -- can you rephrase your question?

7 Q. Yeah. What -- what was -- once you were  
8 gone, they should have seen all the condoms in the  
9 trash. What were they supposed to do?

10 A. I mean, any -- any responsible business, if  
11 they see something like that, should report it.

12 Q. Do you know if they called the police?

13 A. I have no idea.

14 Q. But you never called the police?

15 A. No, I did not.

16 Q. Was Bagz -- whenever you all had a problem  
17 with -- with a john, did Bagz ever come up to the  
18 room and try to, you know, make sure you all weren't  
19 being hurt or, you know, they weren't being  
20 aggressive, they weren't being violent with you, any  
21 of that stuff?

22 A. It depends on the situation.

23 Q. Was one of the roles of Bagz to make sure  
24 you all were protected?

25 A. Absolutely.

1 Q. And that's why he had guns, right?

2 A. Correct.

3 Q. And so if you felt like somebody could hurt  
4 you, you would call Bagz?

5 A. Absolutely.

6 Q. In this instance here, it seems like  
7 there's some aggression going on or some perception  
8 of aggression by [REDACTED]. And she does call Bagz,  
9 right?

10 A. Correct.

11 Q. But he doesn't come. Was it because you  
12 all were already -- the SWAT team had pulled up?

13 A. I believe so.

14 Q. Okay. So he couldn't come up? That's why?

15 A. Yes, sir.

16 Q. Throughout the times that you were  
17 allegedly trafficked, did you ever know a girl that  
18 did not have a pimp or was not being trafficked but  
19 was selling sex for money?

20 A. [REDACTED] would renegade every now and then.

21 Q. Okay. [REDACTED]?

22 A. Yeah, but she would always come back. I  
23 don't know if she still does it with him or not, but  
24 she was doing it on her own for a long time.

25 Q. And do you know why she would do it on her

1           A. Because he knew where my family lived, and  
2 he's threatened my -- threatened me towards my family  
3 before.

4           Q. How did he threaten you towards your  
5 family?

6           A. He knew where they lived, and he told me he  
7 would go kill them.

8           Q. Who? Kill who?

9           A. My family; my parents, my sisters.

10          Q. All of them?

11          A. Yes.

12          Q. Okay. And when did he tell you that?

13          A. I don't recall exactly.

14          Q. Did he tell you that more than once?

15          A. Yes.

16          Q. Okay. This one says, "Officer Harris,  
17 Marinelli, and Giles were conducting a premise check  
18 at 9995 Old Dogwood Road." It says, "Atlanta Hotel."  
19 Does that --

20          A. I think that's what it was called at the  
21 time.

22          Q. "In reference to a possible sighting of the  
23 known prostitute that we confronted the night  
24 before."

25                 He's not -- do you know who he's talking

1 referring to us being pimps or anything like that.

2 Q. Again, this is at the alleged time of you  
3 being trafficked --

4 A. Correct.

5 Q. -- including the Red Roof Hotel.

6 A. Correct.

7 Q. And there's nothing here about, save me,  
8 help me, anything like that, right? Like, I'm being  
9 forced into this?

10 A. No, I don't see any of that on there, no.

11 Q. Okay. Page 4. I just wanted to ask you  
12 about these pictures. I don't know if you recall  
13 where -- where -- where they are or what's going on  
14 here. Do you know?

15 A. So the first three pictures are at the  
16 Marriott Residence Inn in North Carolina. The second  
17 two pictures, I believe that was when I went to  
18 Chicago because I have a black eye, and I've got a  
19 messed up lip.

20 Q. And is the black eye from Bagz?

21 A. It is.

22 Q. And it's the -- your left eye, correct?

23 A. Yes, that's correct.

24 Q. And what do you mean "messed up lip"?

25 A. You can't really tell in the picture, but

1 my lip was busted up as well.

2 Q. And what year was the Marriott Residence  
3 Inn?

4 A. I don't recall.

5 Q. Was it during your alleged trafficking?

6 A. Yeah, it was during my trafficking. I  
7 don't recall exactly what year it was, though.

8 Q. Okay. Next page, [REDACTED], is April 2,  
9 2011. It says "Before I played it, you knew my hand.  
10 You could turn a -- you could turn a free throw to a  
11 goal" -- it's got the N-word -- "got the peephole to  
12 my soul."

13 Do you know what that means?

14 A. It's a song.

15 Q. Oh. What song is that?

16 A. I don't remember what song it is, but it --  
17 it is a song.

18 Q. Okay. Next is March 27 -- March 26, 2011.  
19 And you -- you're posting "FML" and the black heart;  
20 is that right?

21 A. That's what it says, yep.

22 Q. What's "FML" stand for?

23 A. Fuck my life.

24 Q. Do you remember why you're posting that?

25 A. I do not.



1 pronounce her last name -- says, "Where are you  
2 working now, girl?"

3 Who is [REDACTED]?

4 A. Somebody from high school, I think. I  
5 don't even -- I don't remember. I don't remember  
6 where I met her.

7 Q. And this is the time you're being allegedly  
8 trafficked, right?

9 A. Yes.

10 Q. So she's asking you "Where are you working  
11 now, girl?"

12 And you say, "An entertainment company" or  
13 "An ENT company."

14 A. Correct.

15 Q. You weren't working for an entertainment  
16 company, though, were you?

17 A. No. PIVIP was the entertainment company.

18 Q. So -- but you don't say here PIVIP or I'm  
19 being trafficked or I'm -- correct? Or I'm being  
20 forced to have sex for money.

21 A. Correct. But if you look at the next  
22 comment, you can see where that brainwashing comes  
23 in, and I'm still telling her I'm a personal  
24 assistant for the boss and a promotion model.

25 Q. Okay. But at that time, you knew you were

1 of ourself for ads, so I don't think they would be  
2 for ads.

3 Q. Now, in this picture here -- let's go back  
4 to JD-234, the first picture, right? You don't look  
5 beat up here, right? Do you?

6 A. No.

7 Q. Do you look like having malnutrition or  
8 poorly fed or anything like that?

9 A. I was really skinny there, yes.

10 Q. So you would say that you look like you  
11 were -- you had malnutrition here in this -- in this  
12 photograph?

13 A. I would say so.

14 Q. Okay. Do you look like you have poor  
15 hygiene here?

16 A. No.

17 Q. Do you look like you have sleep deprivation  
18 here?

19 A. Kind of.

20 Q. You do?

21 A. I would say so.

22 Q. Okay. What about in 235? Do you look like  
23 you have sleep deprivation there?

24 A. Yeah. You can see the bags under my eyes.

25 Q. Okay. I have bags under my eyes. You

1 think I have sleep deprivation?

2 A. Yeah.

3 Q. Okay.

4 A. You didn't get your full eight hours last  
5 night.

6 Q. I was playing that game, car game.

7 Do -- so on this 235 here, do you -- do you  
8 believe that you're showing poor hygiene here on 235?

9 A. I wouldn't say poor hygiene, no.

10 Q. Do you -- do you -- do you -- do you have  
11 any physical deterioration in 235?

12 A. Besides my skinniness, no.

13 Q. But a lot of people are skinny, right?

14 A. I was never that skinny until I started  
15 doing this. And I lost -- I went down to a Size 0.  
16 I was a hundred pounds, and I've never been that  
17 weight except for that time.

18 Q. But somebody that doesn't know you and you  
19 show up that skinny, they don't know that that's not  
20 your natural status, right?

21 A. I mean, I guess for johns, yeah. But, I  
22 mean, I had people telling me in person that I looked  
23 like I was on crack because I was so skinny.

24 Q. Sure. But a hotel person -- if a hotel  
25 personnel saw you, they don't know what you normally

1 look like. Skinny is not a trait that would make  
2 somebody think, hey, this girl is being trafficked  
3 because she's skinny.

4 A. That's correct.

5 Q. Right?

6 A. Yeah, that's fair.

7 Q. And you have no physical evidence of any  
8 beating here, do you?

9 A. Not that I know of.

10 Q. And would you consider this dress scantily  
11 or scandalous or?

12 A. Yes.

13 Q. So you -- if you walked around wearing  
14 these shoes and this dress, you think somebody should  
15 know that you were being trafficked?

16 A. I can't tell you what other people are  
17 thinking.

18 Q. Well, that's what you said on the lawsuit.  
19 You said on the lawsuit that because the way you guys  
20 were dressed and the way you looked, the hotel knew  
21 or should have known.

22 A. Yeah, they should have because it wasn't  
23 just the way that I was looking. It was the activity  
24 that was going on. It's not just about the way you  
25 look. It's the activity and the things that go with

1 it.

2 Q. But just by looking at you the way -- this  
3 was during your alleged trafficking, right?

4 A. It was, yes.

5 Q. Are you saying just by looking at you and  
6 these other girls, they should have known that you  
7 were being trafficked?

8 MS. MYKKELTVEDT: Object to the form.

9 THE WITNESS: Yeah. That's not what I'm  
10 saying. There was plenty other -- there were plenty  
11 other things that made them -- that should have made  
12 them realize that -- besides just our outward  
13 appearance -- that should have made them realize that  
14 we were being trafficked.

15 BY MR. ALLUSHI:

16 Q. Which is what?

17 A. The multiple men, the coming and going with  
18 multiple men, the cell phones constantly, the paying  
19 with cash every day, paying cash every day -- every  
20 day when we're staying there for two weeks at a time,  
21 having multiple rooms with multiple girls, having --  
22 I mean, there's plenty of -- plenty of different  
23 instances that would have made them know.

24 I mean, the maintenance man at this hotel,  
25 he knew what was going on. He was coming in our

1 rooms. And as far as I can remember, you know, he  
2 would take our trash for us when we wanted to. He  
3 would bring us new trash bags when we wanted to. I  
4 mean, there's plenty --

5 Q. Which maintenance man?

6 A. Huh?

7 Q. Do you remember the name of the maintenance  
8 man?

9 A. I never knew his name, no. I just knew he  
10 was the maintenance man at that hotel.

11 Q. Which hotel?

12 A. The Extended Stay Baton Rouge, the one  
13 we've been talking about.

14 Q. Okay. And so you think hotels are  
15 responsible for observing and determining what people  
16 are coming and going from their rooms, even though  
17 there's outdoor courtyard rooms?

18 A. Absolutely.

19 Q. And they're -- they're responsible for  
20 observing -- and they're responsible for knowing what  
21 goes on inside a guest room?

22 A. No, not necessarily. But they're  
23 responsible for -- ask me that question again.

24 Q. They are responsible for observing and  
25 knowing what goes on inside a guest room?

1 hotels the total time you were allegedly trafficked  
2 at the Red Roof hotels.

3 And you want Red Roof to pay the entire  
4 amount of money you think you're entitled pursuant to  
5 your claims?

6 A. Like I said previously, Bagz was not the  
7 only -- the only pimp at those facilities. There  
8 was -- a majority of the patrons at those facilities  
9 were pimps and their workers, and all the other pimps  
10 were profiting off of it. Then the amount of rooms  
11 and business that Red Roof created from that --  
12 that's Red Roof's responsibility. I don't believe  
13 that that falls on Bagz at all at this point.

14 Q. [REDACTED], I understand what your claims  
15 are. I understand that you've claimed that it was  
16 all pimps and it was all, you know, girls being  
17 trafficked.

18 My question was: You want Red Roof to pay  
19 for the entire damages that you claim in this  
20 lawsuit, although you were allegedly trafficked there  
21 less than 0.01 percent of the time, correct?

22 A. That is correct.

23 Q. And you don't want Bagz to pay any of it?

24 A. That is correct. Again, my reasoning is  
25 because had Red Roof thought of the signs and known

## CERTIFICATE

STATE OF GEORGIA:

COUNTY OF FULTON:

I hereby certify that the foregoing transcript was taken down, as stated in the caption, and the colloquies, questions and answers were reduced to typewriting under my direction; that the transcript is a true and correct record of the evidence given upon said proceeding.

I further certify that I am not a relative or employee or attorney of any party, nor am I financially interested in the outcome of this action.

I have no relationship of interest in this matter which would disqualify me from maintaining my obligation of impartiality in compliance with the Code of Professional Ethics.

I have no direct contract with any party in this action and my compensation is based solely on the terms of my subcontractor agreement.

Nothing in the arrangements made for this proceeding impacts my absolute commitment to serve all parties as an impartial officer of the court.

This the 2nd day of May, 2022.



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Tracy A. Williams, CCR B-2168, RPR